ACQUISITION, TECHNOLOGY

THE UNDER SECRETARY OF DEFENSE

3010 DEFENSE PENTAGON WASHINGTON, DC 20301-3010

0CT 6

The Honorable John D. Dingell Ranking Member Committee on Energy and Commerce U.S. House of Representatives Washington, DC 20515-6115

Dear Representative Dingell:

This is in reply to your recent letter to Secretary Rumsfeld regarding the Department of Defense (DoD) response to perchlorate in the environment. We appreciate the opportunity to provide details of the policies and activities that DoD has undertaken in response to public health concerns about perchlorate.

An important context for our response is the profound significance of perchlorate for National Defense purposes. Salts of perchlorate are a well-known major component of rocket and missile propellants, and a stable oxidizer in many DoD munitions and ordnance items. These salts are also found in DoD and civilian-utilized safety devices such as airbags and ejection seats, and in many other products such as some types of limited-usage fertilizer, fireworks and medicines. Of all the energetic materials the Department has tested, perchlorate is currently the safest for the environment, for public health, and for the military and civilian personnel who operate rockets and/or fire munitions in the field. However, DoD is committed to further research into finding alternative, equally safe energetic compounds.

DoD welcomes the opportunity to clarify the record of its response to EPA's request for perchlorate occurrence data (an abbreviated history is provided at enclosure 1). After forming the Interagency Perchlorate Steering Committee (IPSC) in 1998, EPA requested that DoD provide information related to the use, storage and treatment of perchlorate associated with rocket and missile systems throughout the United States. DoD completed an initial data call from the service components and provided that information to EPA in 1998 (enclosure 2). In addition, EPA has instituted formal data calls under its Unregulated Contaminant Monitoring Rule (UCMR), and DoD drinking water supply facilities required to report under UCMR (i.e., those serving more than 10,000) are providing occurrence data to EPA.

In May of 2000, a working group in DoD initiated a more comprehensive request for information from our active installations. The voluntary survey request comprised a



number of questions including those listed in your letter. Our intent was to determine whether installations had sampled, or been requested by the regulatory community to sample, for perchlorate. Additionally, we were seeking information about propellant disposal areas, open-burn/open detonation (OB/OD) areas, and ordnance or solid rocket testing and/or maintenance facilities. We also requested information regarding items containing perchlorate stored or used at the installation.

Although not all the requested information had been received, at the end of May 2002 DoD directed the Air Force Research Laboratory to compile the available data. Ideally, we would like to complete the survey and also include Formerly Used Defense Sites before release. However, per your request, the data that we received to date are enclosed. We reiterate that they are preliminary, incomplete and unverified (enclosure 3). A workable interactive map is not available at this time, although DoD may in the future use the data from the survey to develop a web-based interactive map. Also, in consideration of homeland security, certain information specific to munitions types, their components, nomenclature and stock numbers are not included. DoD is concurrently providing these data to EPA.

Independent from the contracted survey, additional information more recently collected by the Department on DoD-related perchlorate activities is also attached (enclosure 4), including a compiled list of information specific to National Priorities List (NPL) sites (enclosure 5).

With respect to DoD's November 13, 2002, Perchlorate Assessment Policy Memorandum, the memorandum's reference to "a pathway on their installation where [perchlorate] *could threaten public health* [emphasis added]" is not restricted to drinking water uses but broadly covers any pathway through which perchlorate could threaten public health.

Over the past several years, DoD has been proactive in providing information, personnel and financial resources, and leadership to better understand and meet the challenges of public health concerns about perchlorate in the environment. All of these efforts have been possible through the unique cooperative relationship and personal dedication of the entire membership of the IPSC. As such, we have included an

additional enclosure which details the collaboration between EPA and DoD in responding to potential public health problems that might arise as a result of the national defense uses of perchlorate. A similar letter is being sent to Representative Solis.

Sincerely,

Enclosures:

- 1. Summary of DoD/EPA Cooperation on Perchlorate
- 2. a. 28 Jul 98 Ltr to Mike Osinski (EPA)
 - b. 30 Oct 98 Ltr to Annie Jarabek (EPA)
- 3. 2001 Occurrence Survey
- 4. Data Collected Since 2001 Information
- 5. NPL Sites

cc:

Honorable W. J. Tauzin, Chairman, Committee on Energy and Commerce Honorable Paul E. Gillmor, Chairman, Subcommittee on Environment and Hazardous Materials



THE UNDER SECRETARY OF DEFENSE

3010 DEFENSE PENTAGON WASHINGTON, DC 20301-3010

OCT 6 2003

The Honorable Hilda L. Solis
Ranking Member
Subcommittee on Environment
And Hazardous Materials
Committee on Energy and Commerce
U.S. House of Representatives
Washington, DC 20515-6115

Dear Representative Solis:

This is in reply to your recent letter to Secretary Rumsfeld regarding the Department of Defense (DoD) response to perchlorate in the environment. We appreciate the opportunity to provide details of the policies and activities that DoD has undertaken in response to public health concerns about perchlorate.

An important context for our response is the profound significance of perchlorate for National Defense purposes. Salts of perchlorate are a well-known major component of rocket and missile propellants, and a stable oxidizer in many DoD munitions and ordnance items. These salts are also found in DoD and civilian-utilized safety devices such as airbags and ejection seats, and in many other products such as some types of limited-usage fertilizer, fireworks and medicines. Of all the energetic materials the Department has tested, perchlorate is currently the safest for the environment, for public health, and for the military and civilian personnel who operate rockets and/or fire munitions in the field. However, DoD is committed to further research into finding alternative, equally safe energetic compounds.

DoD welcomes the opportunity to clarify the record of its response to EPA's request for perchlorate occurrence data (an abbreviated history is provided at enclosure 1). After forming the Interagency Perchlorate Steering Committee (IPSC) in 1998, EPA requested that DoD provide information related to the use, storage and treatment of perchlorate associated with rocket and missile systems throughout the United States. DoD completed an initial data call from the service components and provided that information to EPA in 1998 (enclosure 2). In addition, EPA has instituted formal data calls under its Unregulated Contaminant Monitoring Rule (UCMR), and DoD drinking water supply facilities required to report under UCMR (i.e., those serving more than 10,000) are providing occurrence data to EPA.



In May of 2000, a working group in DoD initiated a more comprehensive request for information from our active installations. The voluntary survey request comprised a number of questions including those listed in your letter. Our intent was to determine whether installations had sampled, or been requested by the regulatory community to sample, for perchlorate. Additionally, we were seeking information about propellant disposal areas, open-burn/open detonation (OB/OD) areas, and ordnance or solid rocket testing and/or maintenance facilities. We also requested information regarding items containing perchlorate stored or used at the installation.

Although not all the requested information had been received, at the end of May 2002 DoD directed the Air Force Research Laboratory to compile the available data. Ideally, we would like to complete the survey and also include Formerly Used Defense Sites before release. However, per your request, the data that we received to date are enclosed. We reiterate that they are preliminary, incomplete and unverified (enclosure 3). A workable interactive map is not available at this time, although DoD may in the future use the data from the survey to develop a web-based interactive map. Also, in consideration of homeland security, certain information specific to munitions types, their components, nomenclature and stock numbers are not included. DoD is concurrently providing these data to EPA.

Independent from the contracted survey, additional information more recently collected by the Department on DoD-related perchlorate activities is also attached (enclosure 4), including a compiled list of information specific to National Priorities List (NPL) sites (enclosure 5).

With respect to DoD's November 13, 2002, Perchlorate Assessment Policy Memorandum, the memorandum's reference to "a pathway on their installation where [perchlorate] *could threaten public health* [emphasis added]" is not restricted to drinking water uses but broadly covers any pathway through which perchlorate could threaten public health.

Over the past several years, DoD has been proactive in providing information, personnel and financial resources, and leadership to better understand and meet the challenges of public health concerns about perchlorate in the environment. All of these efforts have been possible through the unique cooperative relationship and personal dedication of the entire membership of the IPSC. As such, we have included an

additional enclosure which details the collaboration between EPA and DoD in responding to potential public health problems that might arise as a result of the national defense uses of perchlorate. A similar letter is being sent to Representative Dingell.

Sincerely,

Michael W. Wynn

'Acting

Enclosures:

- 1. Summary of DoD/EPA Cooperation on Perchlorate
- 2. a. 28 Jul 98 Ltr to Mike Osinski (EPA)
 - b. 30 Oct 98 Ltr to Annie Jarabek (EPA)
- 3. 2001 Occurrence Survey
- 4. Data Collected Since 2001 Information
- 5. NPL Sites

cc:

Honorable W. J. Tauzin, Chairman, Committee on Energy and Commerce Honorable Paul E. Gillmor, Chairman, Subcommittee on Environment and Hazardous Materials